

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Luis Ortega, Alba Cuevas, Ana Gregorio,  
Evelyn Lugo, George Lugo, Edwin Avellanet,  
and Crystal Cruz, by her mother and natural guardian  
Alba Cuevas,

**STIPULATION AND  
ORDER OF DISMISSAL**

13CV6646 (FB) (PK)

Plaintiffs,

-against-

CITY OF NEW YORK, CHARLES DROBNESS,  
Individually, RALPH CONDE, Individually, THOMAS  
NIGRO, Individually, MARY GILLESPIE, Individually,  
YURIY CHUYKO, Individually, THOMAS KAMPER,  
Individually, EFRAIN HERNANDEZ, Individually, JOHNNY  
CASTILLO, Individually, JASON GREENBERG,  
Individually, JOHN YEN, Individually, JOSEPH PERFETTO,  
Individually, KENNETH GREENE, Individually, RICHARD  
GUERRIERI, and JOHN and JANE DOE 1 through 10,  
Individually, (the names John and Jane Doe being fictitious, as  
the true names are presently unknown),

Defendant.

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**WHEREAS**, the parties have reached a settlement agreement and now desire to  
resolve the remaining issues raised in this litigation, without further proceedings and without  
admitting any fault or liability;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by  
and between the undersigned, that

1. The above-referenced action is hereby dismissed with prejudice; and

2. Notwithstanding the dismissal of this action in accordance with this agreement, the District Court shall continue to maintain jurisdiction over this action for the purpose of enforcing the terms of the settlement agreement reached between the parties and set forth in the Stipulation of Settlement executed by the parties in this matter.

Dated: New York, New York  
February 21, 2017

KLEIN CIVIL RIGHTS  
*Attorneys for Plaintiffs*  
305 Broadway #600  
New York, NY 10007  
(212) 335-0132

By: 

Brett Klein  
*Attorney for Plaintiffs*

ZACHARY W. CARTER  
Corporation Counsel of the  
City of New York  
*Attorney for Defendants City of New York,*  
*Conde, Nigro, Gillespie, Drobnness,*  
*Chuyko, Kamper, Hernandez, Castillo,*  
*Greenberg, Yen, Perfetto, Guerrieri, and*  
*Greene*

100 Church Street, 3<sup>rd</sup> Floor  
New York, New York 10007

By: 

March 9, 2017

Linda Mindrutiu  
*Senior Counsel*

SO ORDERED:

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HON. FREDERIC BLOCK  
UNITED STATES DISTRICT JUDGE

Dated: \_\_\_\_\_, 2017